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*Attorneys for Defendant*  
APPLE INC.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

LAUREN HUGHES and JANE DOE,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

APPLE INC., a California corporation,

Defendant.

Case No. 3:22-cv-07668-VC

**DECLARATION OF TIFFANY  
CHEUNG IN SUPPORT  
STIPULATION AND [PROPOSED]  
ORDER TO SET DEADLINE FOR  
APPLE INC.'S ANSWER TO  
AMENDED COMPLAINT**

Judge: Honorable Vince Chhabria

Second Am. Compl. Filed: April 5, 2024

I, TIFFANY CHEUNG, hereby declare as follows:

1. I am an attorney admitted to practice in the State of California and before this Court, and I am a partner of the law firm of Morrison & Foerster LLP, counsel of record for Defendant Apple Inc. (“Apple”). I make this declaration on my own personal knowledge, and if called as a witness to testify, I could and would testify competently to the following facts.

2. The parties met and conferred on May 9, 2024 to discuss setting a deadline for Apple to file its answer to the complaint. Plaintiffs agreed to stipulate that Apple’s deadline to file its answer would be 45 days after the Court issues a motion to dismiss order without leave to amend, or after any deadline for amendment set in a motion to dismiss order has passed without an amended complaint being filed.

3. The parties have previously stipulated twice to extend Apple’s deadline to respond to the complaint in this case (ECF Nos. 25, 35).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 22nd day of May, 2024, at Oakland, California.

/s/ Tiffany Cheung

Tiffany Cheung